

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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GATEGUARD, INC.,

*Plaintiff,*

- against -

GOLDMONT REALTY CORP.,  
LEON GOLDENBERG, ABI GOLDENBERG,

*Defendants.*  
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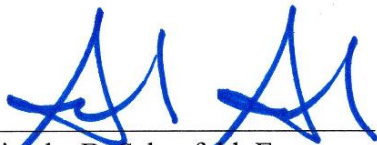
Docket No. 1:20-CV-01609 (GWG)(AJN)

**NOTICE OF MOTION TO  
COMPEL ARBITRATION**

ORAL ARGUMENT NOT  
REQUESTED

**PLEASE TAKE NOTICE**, that upon the accompanying Memorandum of Law in Support of Defendants Goldmont Realty Corp. (“Goldmont”), Leon Goldenberg (“Leon”) and Abi Goldenberg’s (“Abi,” collectively, “Defendants”) Motion to Compel Arbitration or, in the Alternative, Dismiss Plaintiff’s Claims on Substantive Grounds, and the Declaration of Simcha D. Schonfeld, dated October 28, 2021, and the exhibits thereto, Defendants will move this Court, before the Honorable Alison J. Nathan, U.S.D.J., in the United States Courthouse, Southern District of New York, 40 Foley Square, Courtroom 906, New York, New York 10007, on such day when counsel may be heard, for an Order, pursuant to the Federal Arbitration Act, compelling Plaintiff to arbitrate this case before the American Arbitration Association or, granting a stay of proceedings pending arbitration, and granting such other and further relief as the Court deems just and proper.

Dated: New York, New York  
October 28, 2021



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GOLDMONT REALTY CORP.,  
LEON GOLDENBERG, ABI  
GOLDENBERG

TO: All Counsel (by ECF)